

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

STUART A. WILLIAMS, Trustee of)	CIVIL DIVISION
THE STUART A. AND FRANCINE W.)	
WILLIAMS REVOCABLE TRUST,)	Case No. 2:12-cv-01216-DSC
)	
Plaintiff,)	Judge Cercone
)	
v.)	
)	
CEDE & CO., Nominee Name of the)	
Depository Trust Company,)	
)	
Defendant.)	

**PLAINTIFF'S RESPONSE TO THE MOTION FOR LEAVE TO FILE REPLY
MEMORANDUM IN SUPPORT OF MOTION TO QUASH, OR
ALTERNATIVELY, MODIFY SUBPOENAS SERVED ON
NONPARTY HENRY GUSKY, LIQUIDATION TRUSTEE OF
THE PRESIDENT CASINOS, INC. LIQUIDATION TRUST AND
HIS AGENT, COMPUTERSHARE TRUST COMPANY, N.A.**

The Plaintiff, Stuart A. Williams, Trustee of The Stuart A. and Francine W. Williams Revocable Trust (the "Williams Trust") files the following Response to the Motion for Leave to File Reply Memorandum in Support of Motion to Quash, or Alternatively, Modify Subpoenas Served on Nonparty Henry Gusky ("Gusky"), Liquidation Trustee of the President Casinos, Inc. Liquidation Trust and His Agent, Computershare Trust Company, N.A ("Computershare"). The Williams Trust submits that the Court should not grant Gusky and Computershare with leave to file the Reply Memorandum. Similar to their Motion to Quash, the Reply Memorandum continues the personal attacks on Mr. Williams and attempts to frustrate the Williams Trust's attempt to gather documents and communications relevant to the instant matter filed against Cede & Co., nominee name of the Depository Trust Company ("Cede") in this Court. Accordingly, the Court should not grant leave to file the Reply Memorandum.

In the event that the Court grants Gusky and Computershare with leave to file the Reply Memorandum, it is still be clear that the Williams Trust, as permitted in the Federal Rules of Civil Procedure, served Subpoenas upon Gusky and Computershare in order to obtain relevant documents and communications to ascertain how the mistake with the First Liquidation Distribution was made. The Williams Trust requests that the Court grant the Williams Trust with leave to file a brief response to the Reply Memorandum and/or schedule a hearing on the Motion to Quash.

WHEREFORE, the Williams Trust respectfully requests that this Court deny Gusky and Computershare's request for leave to file the Reply Memorandum and order Gusky and Computershare to respond to the Subpoena within ten (10) days of any Order entered and deny Gusky and Computershare's request for attorneys' fees. Alternatively, the Williams Trust requests that the Court grant the Williams Trust with leave to file a brief response to the Reply Memorandum and/or schedule a hearing on the Motion to Quash.

Respectfully submitted,

Date: February 18, 2014

/s/ Danny P. Cerrone, Jr.

Allen M. Lopus, Esquire

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Revocable Trust*

CERTIFICATE OF SERVICE

I hereby certify that, on this 18th day of February 2014, the foregoing was electronically filed with the Clerk of Courts through the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

/s/ Danny P. Cerrone, Jr.

Danny P. Cerrone, Jr.